## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHELLE CHRISTIAN,

Plaintiff.

Civil Action No. 2:24-cv-01319

v.

OMNIS GLOBAL TECHNOLOGIES, LLC; OMNIS BUILDING TECHNOLOGIES, LLC; OBT BLUEFIELD, LLC; OMNIS FUEL TECHNOLOGIES LLC D/B/A OMNIGEN; OMNIS SUBLIMATION RECOVERY TECHNOLOGIES, LLC; AND SIMON HODSON,

Defendants.

## <u>DEFENDANTS' MOTION FOR LEAVE TO AMEND THEIR PARTIAL ANSWER TO</u> <u>FIRST AMENDED COMPLAINT AND COUNTERCLAIM</u>

For the reasons set forth in the accompanying Brief, which is incorporated herein by reference, Defendants Omnis Global Technologies, LLC, Omnis Building Technologies, LLC, OBT Bluefield, LLC, Omnis Fuel Technologies LLC D/B/A Omnigen<sup>1</sup>, Omnis Sublimation Recovery Technologies, LLC, and Simon Hodson move to Amend their Partial Answer to Plaintiff Michelle Christian's ("Plaintiff") First Amended Complaint and Counterclaim.

<sup>&</sup>lt;sup>1</sup> Omnis Fuel Technologies, LLC is no longer using "Omnigen." Omnis Fuel Technologies, LLC is now doing business as "Omnis Energy, LLC."

Dated: July 15, 2025 Respectfully submitted,

## /s/ Matthew J. Hank

Matthew J. Hank, Bar No. 86086 mhank@littler.com Alexa J. Laborda Nelson, Bar No. 314652 alabordanelson@littler.com Haley R. Norwillo, Bar No. 333731 hnorwillo@littler.com LITTLER MENDELSON, P.C. Three Parkway 1601 Cherry Street, Suite 1400 Philadelphia, PA 19102.1321 Telephone: 267.402.3000

Facsimile: 267.402.3131 Attorneys for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of July 2025, a copy of the Defendants' Motion For Leave To Amend Their Partial Answer to First Amended Complaint and Counterclaim was filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

Ari R. Karpf, Esq. Christine E. Burke, Esq. KARPF, KARPF & CERUTTI, P.C. 3331 Street Rd. Two Greenwood Square, Suite 128 Bensalem, PA 19020 (215) 639-0801

> akarpf@karpf-law.com cburke@karpf-law.com

Counsel for Plaintiff

/s/ Matthew J. Hank

Matthew J. Hank